UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1 MILSTEAD & ASSOCIATES, LLC

By: Michael J. Milstead Attorney ID: 021031989

1 E. Stow Road Marlton, NJ 08053 (856) 482-1400 File No.: 231281-5

Attorneys for Secured Creditor: Deutsche Bank National Trust Company, as Trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2007-CH3 Asset Backed Pass-Through Certificates, Series

2007-CH3

In Re:

Loren K. Robinson

Case No.: 19-25547-MBK

Chapter 13

Judge: Michael B. Kaplan

## NOTICE OF MORTGAGE FORBEARANCE

The undersigned is the Attorney for Creditor, Deutsche Bank National Trust Company, as Trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2007-CH3 Asset Backed Pass-Through Certificates, Series 2007-CH3 in this matter. On or about July 1, 2022, the Creditor approved a 3 month Temporary Hardship Forbearance Plan for Debtor's mortgage loan ending in XXXXXX2047 ("subject mortgage loan"), secured by real property described as 600 STOCKER ST, STEWARTSVILLE, NJ 08886, has been impacted by COVID-19. Pursuant to State and/or Federal guidelines, a forbearance has been offered, the terms of which are as follows:

1. The parties agree to a forbearance period of 92 days and have elected to not

tender mortgage payments to Creditor that would come due on the subject mortgage loan starting July 1, 2022 through September 30, 2022.

- 2. Debtor will resume mortgage payments beginning October 1, 2022 and will be required to cure the delinquency created by the forbearance period ("forbearance arrears").
  - 3. The payment amount currently is \$3,269.84.
- 4. The Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period or any payments that were due and owing prior to the forbearance period. Creditor does not waive its rights under the terms of the note and mortgage or under other applicable non-bankruptcy laws and regulations, including, but not limited to, RESPA, and the right to collect on any post-petition escrow shortage.
- 5. The Creditor does not waive its rights to seek relief from the automatic stay for reasons other than non-payment of the mortgage, including, but not limited to, a lapse in insurance coverage or payment of property taxes.
- 6. The Debtor does not waive any rights upon expiration of the forbearance period. Prior to the expiration of the forbearance period, however, the Debtor must take the following affirmative steps to address the status of the subject mortgage loan including, but not limited to:

  (a) bringing the account post-petition current; (b) requesting extension of the forbearance period; (c) applying for loss mitigation; and/or (d) amending the Chapter 13 Plan.
- 7. Any objection to this Notice must be filed and served not later than 14 days after the filing of the Notice. The Court may conduct a hearing on the objection.

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This Notice is intended to disclose a temporary forbearance of the Debtor's obligation to remit post-petition payments for the forbearance period. Nothing within this Notice should be construed to alter any rights, duties, or deadlines that are not related to the remittance of post-petition mortgage payments.

Date: August 2, 2022

Respectfully submitted, MILSTEAD & ASSOCIATES, LLC

/s/ Michael J. Milstead Michael J. Milstead, Esquire Attorney ID No. 021031989 1 E. Stow Road Marlton, NJ 08053 (856) 482-1400 Attorneys for Creditor

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UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-20
MILSTEAD & ASSOCIATES, LLC
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File No. 231281-5

Attorneys for Secured Creditor: Deutsche Bank National Trust Company, as Trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Trust 2007-CH3 Asset Backed Pass-Through Certificates, Series 2007-CH3

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## **CERTIFICATION OF SERVICE**

1.	I, Michael J. Milstead, Esquire:			
	represent the <u>Secured Creditor</u> in the above-captioned matter.			
	$\square$ am the secretary/paralegal for, who represents the			
in the above captioned matter.				
	$\square$ am the in the above case and am representing myself.			
2. On August 2, 2022, I sent a copy of the following pleadings and/or documents to the				
	in the chart below:			
	NOTICE OF MORTGAGE FORBEARANCE			
3.	I hereby certify under penalty of perjury that the above documents were sent using the mode of			
	service indicated.			
DATEI	D: August 2, 2022 /s/ Michael J. Milstead			

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853	Trustee	☐ Hand-delivered ☐ Regular Mail ☐ Certified mail/RR ☐ E-mail ☑ Notice of Electronic Filing (NEF) ☐ Other (as authorized by the court *)
Lee Martin Perlman Lee M. Perlman 1926 Greentree Road Suite 100 Cherry Hill, NJ 08003	Debtor's Attorney	☐ Hand-delivered  ☑ Regular Mail ☐ Certified mail/RR ☐ E-mail ☑ Notice of Electronic Filing (NEF) ☐ Other (as authorized by the court *)
Loren K. Robinson 600 Stocker St Stewartsville, NJ 08886	Debtor	☐ Hand-delivered  ☑ Regular Mail ☐ Certified mail/RR ☐ E-mail ☐ Notice of Electronic Filing (NEF) ☐ Other (as authorized by the court *)

<sup>\*</sup> May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.